SECTION 2.0

ALTERNATIVES

SECTION 2.0
ALTERNATIVES

2.1 INTRODUCTION

This section describes the alternatives that are analyzed within this Environmental Impact Statement/Tribal Project Environmental Document, hereinafter referred to as an EIS. These alternatives include six development alternatives as well as the No Action/No Development Alternative. Consistent with Council on Environmental Quality (CEQ) guidelines (40 CFR Section 1502.14) and those described in the Memorandum of Understanding (**Appendix B**), this section includes a detailed discussion and comparison of the alternatives analyzed in this EIS. Alternatives that were considered but are not analyzed in this EIS are also described. A reasonable range of alternatives has been selected based on consideration of the purpose and need of the Proposed Action and opportunities for potentially reducing environmental effects. The range of alternatives includes:

Alternative A – Proposed Twin Cities Casino Resort
Alternative B – Reduced Intensity Twin Cities Casino
Alternative C – Retail on Twin Cities Site
Alternative D – Casino Resort at Historic Rancheria Site
Alternative E – Reduced Intensity Casino at Historic Rancheria Site
Alternative F – Casino Resort at Mall Site
Alternative G – No Action

2.2 ALTERNATIVE A – PROPOSED TWIN CITIES CASINO RESORT

2.2.1 PROJECT LOCATION AND ACCESS

The Proposed Action project site (Twin Cities site) is a 282-acre property located within unincorporated Sacramento County (County), California. The Twin Cities site is bordered by California State Route 99 (Highway 99) to the east, Union Pacific Railroad to the west, Laguna Creek to the north, and Twin Cities Road and rural residential developments to the south. A majority of the Twin Cities site land outside of the Laguna Creek floodplain is located within the City of Galt (City) sphere of influence area. The Twin Cities site is located approximately 10 miles south of the Tribe's historic Rancheria.

Access to the Twin Cities site would be provided via a driveway constructed as part of the Proposed Project located along West Stockton Boulevard, to the northwest of the existing Highway 99 and West Stockton Boulevard off-ramp.

The Twin Cities site is compatible with the Tribe's purposes and needs, as described below:

- It is located approximately 10 miles south of the Tribe's historic Rancheria site, which is the Tribe's ancestral homeland.
- The site is located within close proximity to the historic tribal cemetery.
- The site's topography, highway access and proximity to potential customers make it economically feasible.
- At 282 acres, the site may be sufficiently large and environmentally diverse so as to provide the Tribe with the opportunity to use portions of it to mitigate environmental impacts.

2.2.2 FEE-TO-TRUST TRANSFER

The Bureau of Indian Affairs (BIA) will make its determination regarding the fee-to-trust acquisition in accordance with the procedures set forth in 25 CFR Part 151. The Tribe's fee-to-trust application provides detailed information on the land being taken into trust. The regulations in 25 CFR Part 151 implement Section 5 of the Indian Reorganization Act (IRA), codified at 25 U.S.C. § 465. Section 5 of the IRA is the general statute that provides the Secretary with authority to acquire lands in trust status for tribes and individual Indians.

2.2.3 MANAGEMENT CONTRACT

Congress enacted the Indian Gaming Regulatory Act (IGRA) (25 CFR §2701 - 2721) with the stated purpose of providing a statutory basis for the operation and regulation of gaming by Native American tribal governments. As part of its regulatory function, the National Indian Gaming Commission (NIGC), which was established under IGRA, is charged with the authority to approve management contracts between tribal governments and outside management groups. To approve a management contract, the NIGC must determine that the contract is consistent with IGRA in terms of contract period, management company payment, and protection of tribal authority. The NIGC also conducts extensive background checks on the management company's key personnel. The NIGC may determine that, under NEPA, an EIS or an Environmental Assessment is required for the management contract. If so, this EIS is intended to provide the environmental analysis and proposed mitigation to allow the NIGC to comply with NEPA without having to prepare a separate environmental document.

The potential management contract between the Tribe and a management company would assist the Tribe in obtaining funding for the development of the Proposed Action. Once the facility becomes operational, the management company would have the exclusive right to manage day-to-day operations of the casino-resort facility for a period of time. The Tribe and the management company must comply with the terms of IGRA and the NIGC's regulatory requirements relating to the operation of the Tribal gaming facility. The Tribal Government would maintain the ultimate authority and responsibility for the development, operation, and management of the casino pursuant to IGRA and NIGC regulations.

2.2.4 TRIBAL-STATE GAMING COMPACT

IGRA generally requires that a Tribal-State Compact (Compact) be established prior to initiation of Class III gaming on tribal lands (25 U.S.C. § 2710(d)(3)(A)).

Recent California Tribal-State Compacts have required tribes to prepare a Tribal Environmental Impact Report (TEIR) to analyze the potential off-reservation environmental impacts of a casino development. Potential off-reservation environmental impacts that are listed in the Off-Reservation Environmental Impact Analysis Checklist (**Appendix G**) are analyzed in the EIS.

Recent California Compacts have also included the following provisions:

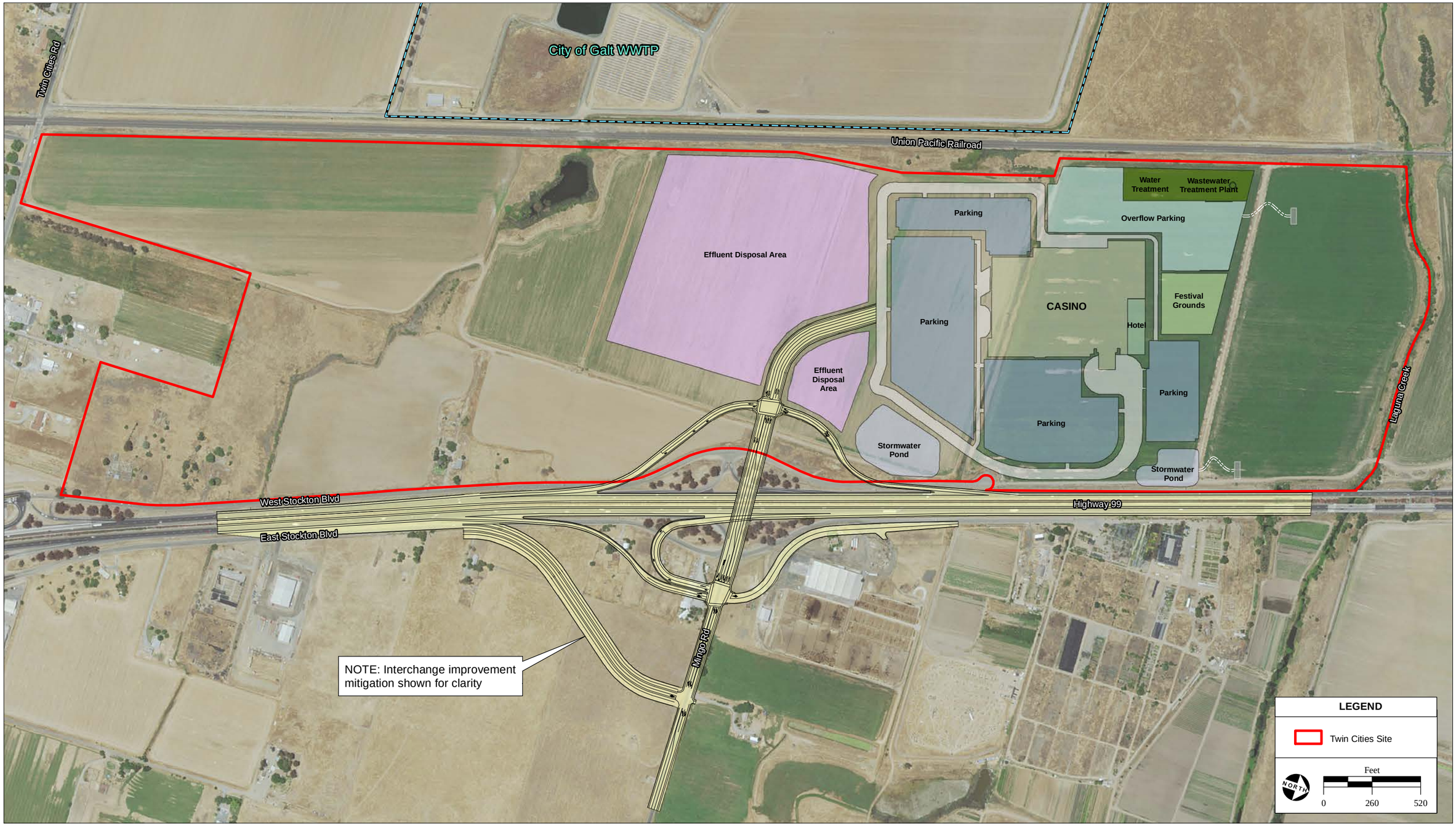
- Development will be issued a certificate of occupancy by the Tribal Gaming Agency prior to occupancy;
- Tribal Government will adopt and comply with standards no less stringent than State public health standards for food and beverage handling;
- Tribal Government will adopt and comply with standards no less stringent than federal air quality, water quality, and safe drinking water standards applicable in California;
- Tribal Government will adopt and comply with standards no less stringent than federal workplace and occupational health and safety standards;
- Tribal Government will comply with Tribal codes and other applicable federal law regarding public health and safety; and
- The Tribal Government will make reasonable provisions for adequate emergency, fire, medical, and related relief and disaster services for patrons and employees of the gaming facility.

For the purposes of analysis in this document, it is anticipated that any compact will include these provisions. As noted in **Section 1.0**, this EIS is also intended to serve as the TEIR that may be necessary as part of the California Compact negotiation process.

2.2.5 ALTERNATIVE A PROJECT COMPONENTS

Alternative A consists of the following components: 1) the transfer of a 282-acre parcel from fee-to-trust status for the benefit of the Wilton Rancheria (Tribe) and 2) development of the trust property with a variety of uses including, but not limited to, a casino, hotel, retail, parking, and other supporting facilities.

Alternative A consists of the construction of a casino, hotel, and restaurant space on approximately 76-acres of the 282-acre Twin Cities site. No development is proposed on the southern part of the site. A site plan for the proposed facilities is presented as **Figure 2-1** and an architectural rendering, which shows the two-story (15-foot) tall hotel windows, is presented as **Figure 2-2**. The two-story tall windows are an architectural feature that provide the exterior appearance of unusually high ceilings for each floor. **Table 2-1** provides a breakdown of project components with associated square footages. The Proposed Action



SOURCE: Kimley-Horn, 2015; Microsoft aerial photograph, 2/2/2012; AES, 7/21/2015

Figure 2-1

Alternative A - Proposed Twin Cities Casino Resort Site Plan

SOURCE: Klai Juba Wald Architects, 2014; AES, 2014

Figure 2-2
Alternative A – Architectural Rendition

is anticipated to be constructed to meet the International Building Code. Development is anticipated to begin in 2017 with an 18-month construction schedule.

TABLE 2-1
ALTERNATIVE A – PROPOSED TWIN CITIES CASINO RESORT

Area	Seats/Rooms/ Parking Spaces	Approximate Square Footage
Casino		
Main Floor		96,360
High Limits		7,100
Poker		6,800
Front of House Services		
Retail		2,600
Fitness		3,000
Spa		8,507
Other services		15,850
Restaurants		
Buffet	360 seats	9,450
Café	150 seats	4,350
Specialty Tenants/Other	265 seats	12,825
Bar/Lounge	235 seats	8,300
Pool Grill	60 seats	2,200
Steakhouse	150 seats	4,075
Employee Dining	125 seats	3,300
Convention Center		48,150
Casino Support		1,200
Hotel		
Standard/ Suites	302 rooms	225,280
Parking		
Valet	500 spaces	
Surface Parking	2,400 spaces	
Employee	600 spaces	
Back of House[1]		142,440
Total Square Footage[2]		601,780

Source: Klai Juba Architects, 2014.
[1]Total back of house square feet less 36,080 sf hotel back of house included above.
[2]Line items do not precisely add to total due to rounding.

Alternative A is anticipated to employ approximately 2,000 full time equivalent (FTE) employees (**Appendix H**). The approximate average number of patrons per weekday is 8,100-9,000, while the number of anticipated daily weekend patrons is 12,900-14,200 (Boyd, 2014).

Casino and Hotel

The proposed casino/hotel facility would have a gross footprint of 601,780 square feet (sf). The gaming component of the facility would consist of electronic gaming devices, table games, and poker room tables within a 110,260 sf gaming floor area that would be open 24 hours a day. Restaurant facilities include a 360-seat buffet, as well as a café, sports bar, food court, and other food and beverage providers. A 60-seat pool grill, a retail area of approximately 2,600 sf, an approximately 3,000 sf fitness center, an approximately 8,500 sf spa, and an approximately 48,000 sf convention center are also proposed. The

proposed hotel would be 12 levels and a total of 302 guest rooms. The casino and hotel would be identified by a large sign placed near the freeway that would be visible to travelers on Hwy 99.

Public Services

Service Providers

The Sacramento County Sheriff's Department (SCSD) and/or the City of Galt Police Department (Galt PD), in conjunction with Tribal security staff would provide law enforcement for the gaming facility and hotel complex to reduce or prevent criminal and civil incidents. The California Department of Fire and Forestry (CalFire), the Cosumnes Community Services District (Cosumnes CSD) Fire Department, or an equivalent entity would provide fire protection and emergency medical services to the gaming facility.

Cosumnes Letter of Intent

The Tribe and the Cosumnes CSD Fire Department entered into a Letter of Intent for Fire and Emergency Services, dated September 8, 2014 (Cosumnes Letter of Intent) (**Appendix E**). The purpose of the Cosumnes Letter of Intent is to set for the framework in which the Cosumnes CSD Fire Department and the Tribe will negotiate in good faith for the provision of fire protection and emergency medical services. It is intended that such negotiations shall culminate in a Memorandum of Understanding (MOU) and/or a services agreement that would set forth the specific terms under which services shall be provided.

Water Supply

Domestic Water Supply

The estimated average daily water consumption for Alternative A (including landscape and irrigation) would be approximately 295,000 (**Appendix I**). Should an on-site wastewater treatment plant (WWTP) be developed (as described below), recycled water would be used for indoor non-potable uses and for landscaping, dropping the peak day demand.

On-site Supply (Option 1)

Water for domestic use, emergency supply, and fire protection would be provided by on-site wells. On-site water facilities would include two on-site groundwater wells (one for continuous supply and one for redundancy in case of malfunction or maintenance of the primary well), a treatment plant, a water storage tank, and an internal distribution system. The wells would be between 300 and 500 feet deep. The existing on-site wells, currently for farm irrigation, would either be abandoned, would be used as monitoring wells, or would remain in agricultural use.

Off-site Supply (Option 2)

Under Water Supply Option 2, the City of Galt's municipal public water system would be extended to the Twin Cities site to serve the Proposed Action. Extending the City of Galt's water system connection

would require construction of approximately 9,750 linear feet of piping along Bergeron Road crossing Mingo Road and Highway 99 to connect to the southeast corner of the Twin Cities site (**Figure 2-3**). The City of Galt could also provide recycled water to the site.

Fire Flow

The required fire flow for a casino resort would be the combined flow required for the fire hydrants and sprinkler systems, which is determined by the International Fire Code (IFC) and National Fire Protection Association (NFPA) Code 13. As discussed in the Water and Wastewater Feasibility Study, a capacity rate of 3,000 gallons per minute (gpm) for four hours would be required to supply the necessary fire flow for Alternative A (**Appendix I**).

Wastewater Treatment and Disposal

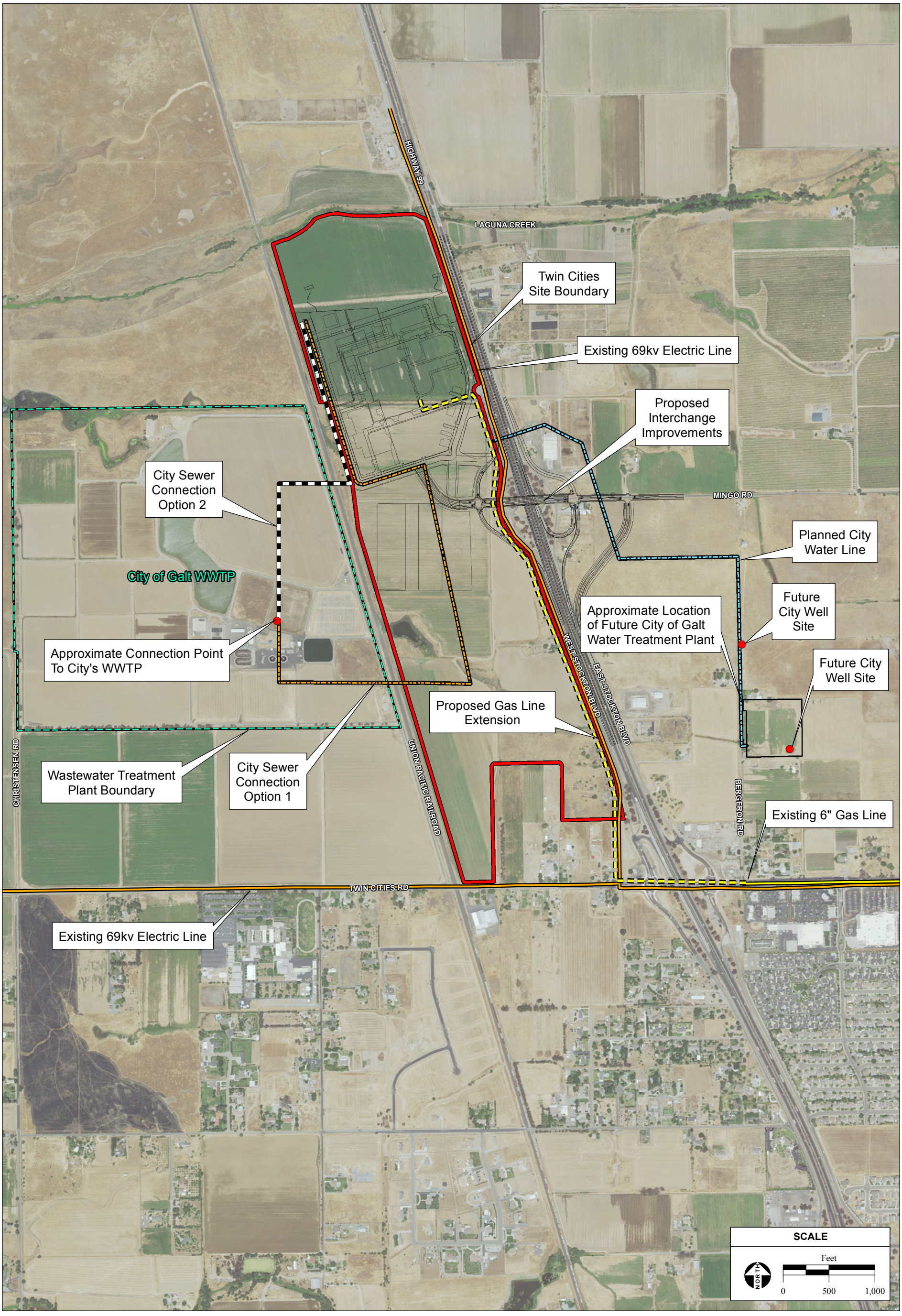
The projected average daily wastewater flow for Alternative A would be approximately 231,000 gpd with peak flows estimated at 308,000 gpd.

On-site Treatment and Disposal (Option 1)

Wastewater may be treated at an on-site WWTP, located to the northwest of the casino and hotel (**Figure 2-1**). The WWTP would be sized to treat the peak flow. An immersed membrane bioreactor (MBR) system would be used to provide tertiary-treated water for reuse or disposal. The MBR is a state-of-the-art system that consists of utilizing a biological reactor and microfiltration in one unit process. The ability of an MBR to eliminate secondary clarification and to operate at higher suspended solids concentrations gives the system the ability to react to wide variations in flows as would be expected at gaming facilities on weekends or holidays. A detailed description of the wastewater treatment facility is presented in **Appendix I**.

Reclaimed water from the on-site WWTP would be utilized for casino toilet flushing and landscape irrigation. To use recycled water for "in-building" purposes, the plumbing system within the building would have recycled water lines plumbed separately from the building's potable water system with no cross connections. The dual plumbing systems would be distinctly marked and color-coded.

All water used for reclamation would meet the equivalent of State standards governing the use of recycled water as described in Title 22 of the California Code of Regulations. Title 22 specifies redundancy and reliability features that must be incorporated into the reclamation plant. Under the current version of the Title 22 Water Recycling Criteria, the highest level of treatment is referred to as "Disinfected Tertiary Recycled Water." The proposed WWTP would produce an effluent meeting the criteria for this highest level of recycled water. Disinfected tertiary-treated recycled water can be used for irrigation of parks, playgrounds, schoolyards, residential landscaping, golf courses and food crops. Additional permitted uses include non-restricted recreational impoundments, cooling towers, fire-fighting, toilet flushing, and decorative fountains. The water produced by this treatment system is highly treated and poses negligible



SOURCE: City of Galt, 2010; UC-G Aerial Photograph, 02/2012; AES, 10/22/2015

Figure 2-3

City of Galt Potential Water Supply and Wastewater Treatment Connections and Infrastructure Upgrades, Alternatives A,B,C

health risks for the intended uses. Bio-solids from the WWTP would be dewatered with a belt press, and the resulting sludge would be sent to a permitted landfill.

Effluent reuse would require a 160,000 gallon recycled water storage tank, a recycled water pump station, on-site landscape irrigation facilities, and dual plumbing. The purpose of the recycled water storage tank would be to provide equalization storage for on-site recycled water use for toilet flushing, on-site landscaping, and for effluent discharge. Recycled water could also be used to supply water for fire protection.

Treated Effluent Disposal

Treated effluent that is not used as reclaimed water may be discharged through sub-surface disposal, or a combination of spray disposal and sub-surface disposal as discussed below.

Sub-Surface Disposal

On-site leach fields could be used to dispose of treated wastewater effluent by distributing it underground through a network of perforated pipes or infiltration chambers. Sub-surface disposal requires good percolation and several feet of clearance above the highest groundwater levels. The location of the leach fields are shown in **Figure 2-1**. A maximum of 21.7 acres of leach fields would be required for disposal of peak day flows estimated at 308,000 gpd. A 200,000 gallon effluent storage tank would be required to hold half of the peak day wastewater flows.

Combination of Surface and Sub-Surface Disposal

Under this disposal option, on-site spray fields would be used in conjunction with leach fields. The combined disposal area would be approximately 6.2 acres of spray fields and 16.6 acres of leach fields. Spray field disposal is a technique in which treated effluent is applied to spray fields at agronomic rates throughout the year. During rain events, spray fields cannot be used. The location of the combination spray and leach fields are shown in **Figure 2-1**. A 550,000 gallon effluent storage tank would be necessary to hold 20 days' worth of peak flow during rain events, when no surface disposal would occur.

Off-site Treatment and Disposal (Option 2)

Alternatively, under Alternative A Wastewater Option 2, wastewater treatment would be provided by the City of Galt via connection to the City's conveyance system and WWTP. There are two possibilities for this connection. Connection to the existing treatment system would be provided either by a new 4,200 foot long pipeline extending through the central part of the Twin Cities site, or by a 3,600 foot long pipeline connection to the City of Galt's WWTP extending in a westerly direction from the southwest corner of the Twin Cities site (**Figure 2-3**). A detailed description of the pipeline and connection to the City's system is provided in **Appendix I**.

Grading and Drainage

There is a creek to the north of the Twin Cities site, and a wetland located to the south. Construction would involve grading and excavation for building pads and parking lots. Approximately 63.4 acres of impervious surfaces would be created on-site. As discussed in the Grading and Drainage Analysis Report (Summit, 2014b; **Appendix J**), it is anticipated that 640,000 cubic yards of fill would be necessary to construct Alternative A. Approximately 16,000 cubic yards of fill soil may be available from excavation of the detention basins, therefore additional material would need to be excavated from other locations on the property.

Alternative A would include several storm drainage improvements. Surface parking lots would be constructed with a slope toward storm drain inlets, which would be placed at appropriate intervals to capture runoff and convey it to vegetated swales located in the parking lots and surrounding the site.

Vegetated swales would convey the stormwater to a series of stormwater detention basins. A total of 11 acre-feet of on-site storage would be provided in the stormwater detention system to account for the increase in runoff created by new impervious surfaces.

Currently, existing culverts to the immediate east along West Stockton Boulevard convey stormwater and off-site irrigation water into a channelized ditch on the Twin Cities site (**Appendix J**). The water in the channelized ditch continues west until it eventually flows into Laguna Creek. After construction of project, the flow now going through this channelized ditch would instead be conveyed through a new stormwater culvert. Stormwater from a portion of the southern site, after treatment in the vegetated swales, would flow to this culvert, which would convey off-site surface water and stormwater through the site. This culvert would terminate where the channelized ditch currently leaves the Twin Cities site, adjacent to the railroad tracks to the west of the development area.

Energy

Electrical service to the Twin Cities site is currently provided by Sacramento Municipal Utilities District (SMUD). No existing natural gas service lines connect to the site. Pacific Gas and Electric (PG&E) and other private providers currently supply natural gas services to customers in the vicinity of the Twin Cities site, and service may be extended to the site. SMUD serves the project vicinity out of its Twin Cities Substation, located to the west of the Twin Cities Road/West Stockton Boulevard intersection to the immediate south of the Twin Cities site. The estimated electrical connected load is 12.5 megawatts (MW) and the estimated demand load is 8.12 MW (JBA Consulting Engineers, 2015). The estimated natural gas connected peak demand is 25,000 cubic feet per hour (CFH) (JBA Consulting Engineers, 2015). **Figure 2-3** shows existing gas and electric lines in the vicinity of the Twin Cities site, as well as the proposed gas line connection of approximately 7,700 linear feet. Electricity would be provided by a new substation that would draw electricity from the existing 69 kilovolt (kV) power line that extends along the eastern boundary of the site.

Memorandum of Understanding with Sacramento County and the City of Elk Grove

A Memorandum of Understanding (MOU) was signed on June 17, 2011 by and between the County, the City of Elk Grove, and the Tribe. The MOU describes the parties' mutually respectful government-to-government relationship, reaffirms the Tribe's sovereignty as a federally recognized Indian tribe, and reaffirms the Tribe's right to take land into trust. The MOU includes a number of other provisions, which are summarized as follows:

- Tribal lands within the County must be reviewed for consistency with the General Plan.
- The Tribe is required to prepare a Tribal Project Environmental Document (TPED), which, among other things, shall include mitigation measures.
- The Tribe is bound to finance any mitigation identified in the TPED.
- The MOU includes dispute resolution mechanisms.
- The MOU does not include an expiration date.

Best Management Practices

Construction and operation of Alternative A would incorporate a variety of industry standard Best Management Practices (BMPs).

Section 5.0 presents select BMPs that have been specifically incorporated into the project design to avoid or minimize potential adverse effects resulting from the development of Alternative A.

2.3 ALTERNATIVE B – REDUCED INTENSITY TWIN CITIES CASINO

Alternative B is similar to Alternative A in many respects including the transfer of the 282-acre Twin Cities site into federal trust and the development of a casino and associated facilities; however, the project would be of a reduced scale, as described below.

2.3.1 ALTERNATIVE B PROJECT COMPONENTS

Alternative B is proposed on the same Twin Cities site as Alternative A. Similar to the Proposed Action, the Alternative B development area is in the northern portion of the Twin Cities site. Alternative B consists of the construction of a casino, restaurants, some in-casino retail, and parking facilities. Alternative B would be similar to Alternative A, but without a hotel. Alternative B would employ approximately 1,700 FTE employees (**Appendix H**) and approximately 8,100 – 9,000 patrons would visit the facility on weekdays, while the number of anticipated on weekends is 12,900-14,200 (Boyd, 2014).

A site plan for the proposed facilities is presented as **Figure 2-4**. **Table 2-2** provides a breakdown of Alternative B components with associated square footages.

TABLE 2-2
ALTERNATIVE B – REDUCED INTENSITY TWIN CITIES CASINO

Area	Seats/Rooms/ Parking Spaces	Approximate Square Footage
Casino		
Main Floor		96,360
High Limits		7,100
Poker		6,800
Casino Support		**1,200**
Front of House Services		
Retail		2,600
Other services		11,450
Restaurants		
Buffet	360 seats	9,450
Café	150 seats	4,350
Specialty Tenants/Other	265 seats	12,825
Bar/Lounge	235 seats	8,300
Steakhouse	150 seats	4,075
Employee Dining	125 seats	3,300
Parking		
Valet	500 spaces	
Surface Parking	2,400 spaces	
Employee	600 spaces	
Back of House		124,965
Total Square Footage		292,775

[1]Total back of house square feet less 36,080 sf hotel back of house included above.
[2]Line items do not precisely add to total due to rounding.
Source: Klai Juba Architects, 2014

Casino Facility

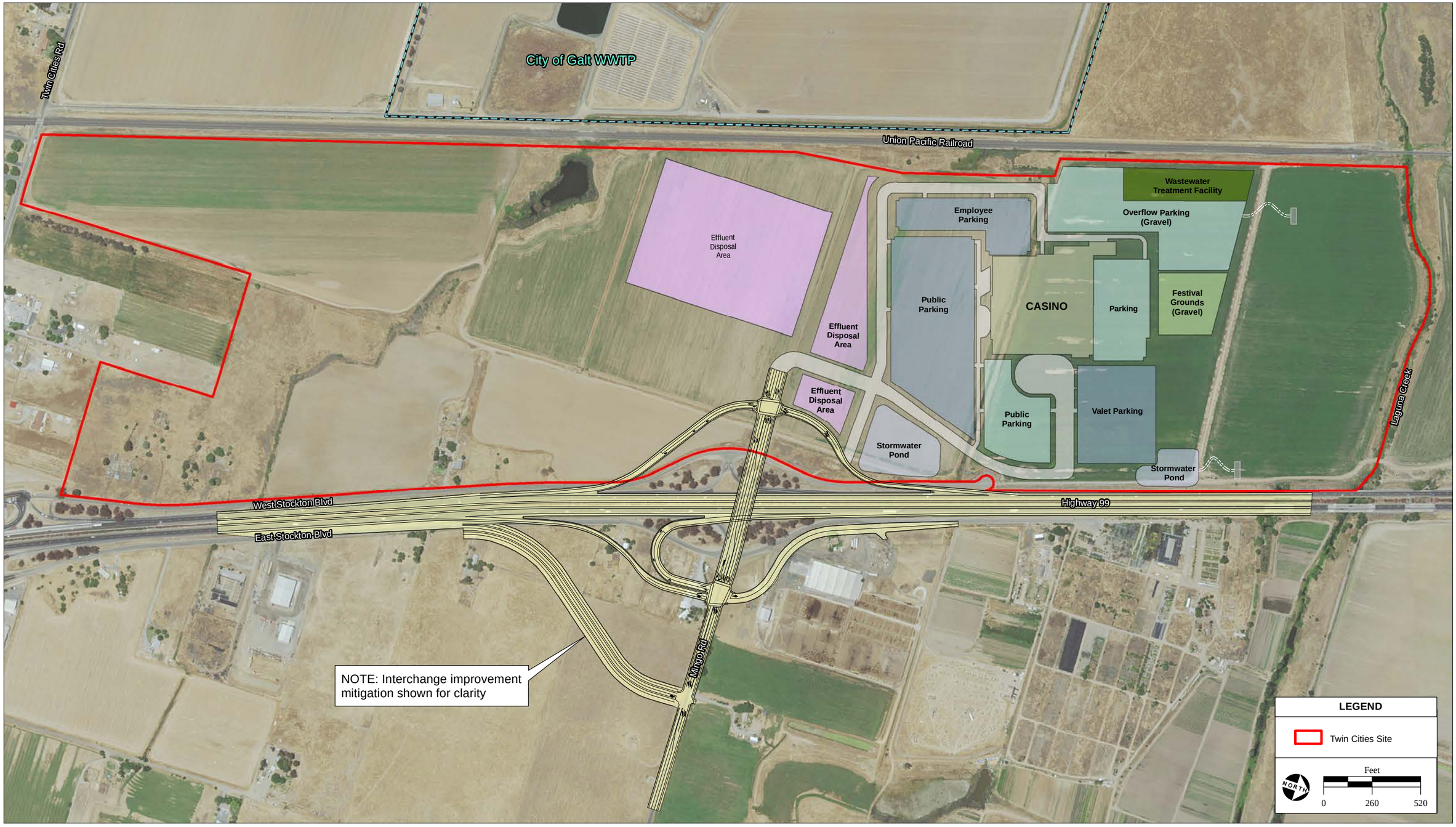
Under Alternative B, the proposed casino facility would be 292,775 sf with a 110,260 sf gaming floor. Other facilities within the casino structure include retail and restaurants. A total of 2,900 surface parking spaces would be provided. Under Alternative B required site access improvements are similar to those described under Alternative A. Refer to the description of each component under Alternative A (**Section 2.2.5**) for more detail.

Public Services

SCSD and/or the Galt PD, in conjunction with Tribal security staff would provide law enforcement for the gaming facility. CalFire, the Cosumnes CSD Fire Department, or an equivalent entity would provide fire protection and emergency medical services to the gaming facility. The casino would be identified by a large sign placed near the freeway that would be visible to travelers on Hwy 99.

Water Supply

The estimated average daily water consumption for Alternative B (including landscaping and irrigation) would be approximately 227,000 gpd (**Appendix I**). Similar to Alternative A, a flow of 3,000 gpm for four hours would be provided for fire flow.



SOURCE: Klai Juba Architects, 2014; Microsoft aerial photograph, 2/2/2012; AES, 7/21/2015

Figure 2-4

Alternative B - Reduced Intensity Twin Cities Casino Site Plan

As with Alternative A, two water supply options are included under Alternative B. These options (Water Supply Option 1 and Option 2) are identical to those options described above in **Section 2.2.5**. Should an on-site WWTP be developed (as described below), recycled water would be used for indoor non-potable uses and for landscaping, dropping the peak day water demand.

Wastewater Treatment and Disposal

The projected average daily wastewater flow for Alternative B would be approximately 154,000 gpd, with peak day flows estimated at 205,000 gpd. As with Alternative A, Alternative B includes two similar wastewater treatment and disposal options as described in **Section 2.2.5** and described in detail within the Water and Wastewater Feasibility Study (**Appendix I**). Effluent reuse would require a 170,000 gallon recycled water tank, as well as the other components described under Alternative A in **Section 2.2.5**.

Treated effluent from the on-site WWTP (Wastewater Option 1) would be discharged through sub-surface disposal, or through a combination of spray disposal and sub-surface disposal. The location of the leach field only option and the combination spray and leach field option is shown in **Figure 2-4**. For the disposal of peak day flows estimated at 205,000 gpd, 15.0 acres of leach fields would be required, as well as a 150,000 gallon effluent storage tank. Under the combined disposal option, approximately 6.2 acres of spray fields and 11.0 acres of leach fields would be developed. A 550,000 gallon effluent storage tank would be necessary to hold 20 days' worth of peak flow during rain events, when no surface disposal would occur.

Alternative B Wastewater Option 2, similar to Alternative A, would tie into the City's WWTP via a proposed pipeline that would connect directly to the WWTP. On-site connection points and the off-site pipeline routes are shown in **Figure 2-3**.

Grading and Drainage

Construction would involve grading and excavation for building pads and parking lots. It is anticipated that approximately 570,000 cubic yards of fill is necessary to construct Alternative B. Approximately 62.6 acres of impervious surfaces would be created on-site. Approximately 16,000 cubic yards of fill soil may be available from excavation of the detention basins, therefore additional material would need to be imported from offsite or excavated from other locations on the property. Under Alternative B, bio-filtration swales would be located around the development area to take advantage of topography and building placement to provide optimum site drainage as shown on **Figure 2-4**. A total of 11 acre-feet of on-site stormwater storage would be provided to account for the increase in runoff created by new impervious surfaces.

Best Management Practices

As with Alternative A, construction and operation of Alternative B would incorporate a variety of industry standard BMPs. **Section 5.0** presents select BMPs that have been specifically incorporated into the project design to avoid or minimize potential adverse effects resulting from the development of Alternative B.

2.4 ALTERNATIVE C – RETAIL ON THE TWIN CITIES SITE

Under Alternative C, a retail commercial development would be built on the Twin Cities site. This non-gaming alternative would still involve taking the Twin Cities site into trust. Components of Alternative C are described below.

2.4.1 ALTERNATIVE C PROJECT COMPONENTS

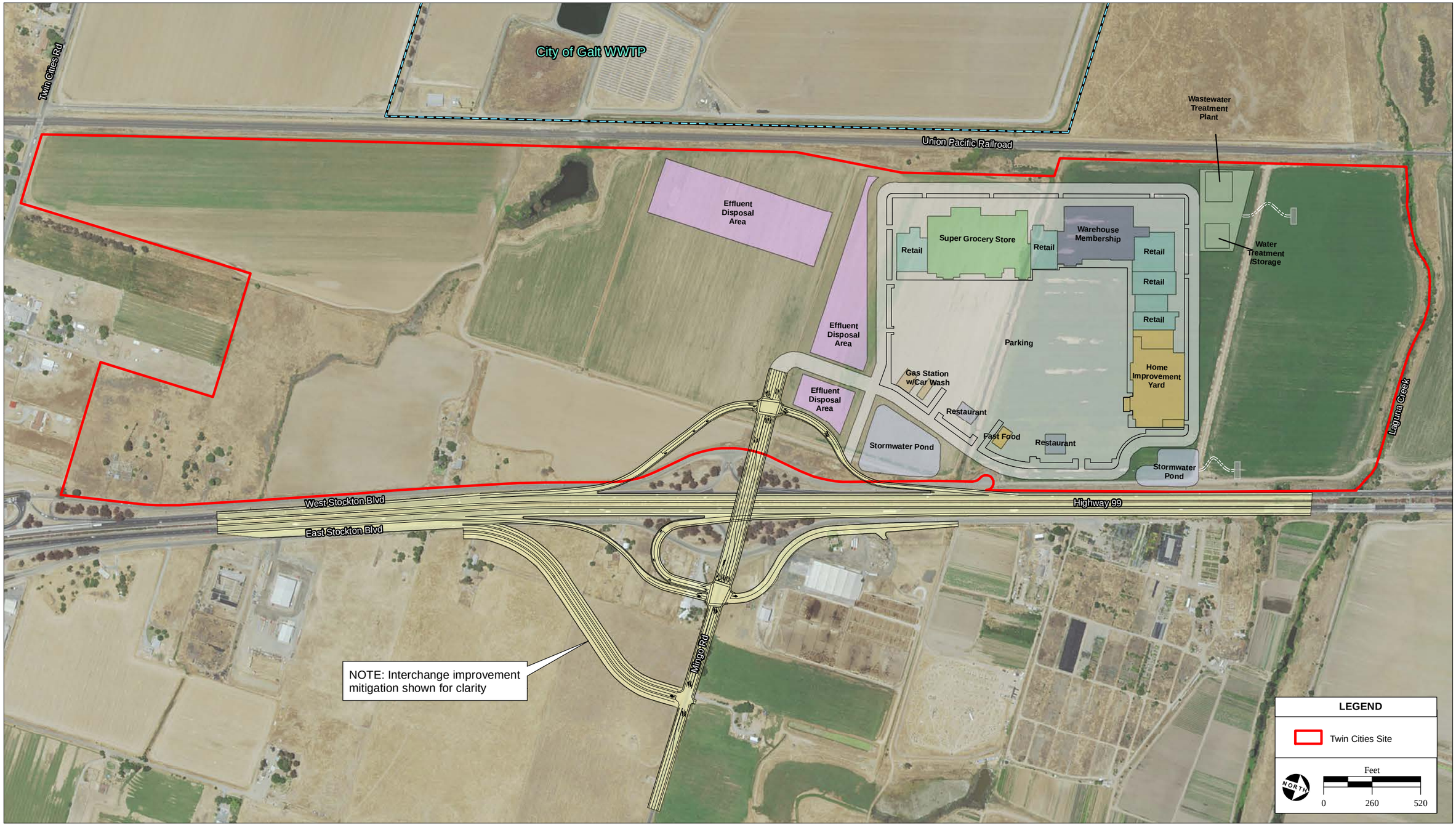
Alternative C consists of the construction of a retail complex and parking facilities on the north portion of the Twin Cities site. A site plan for the proposed facilities is presented as **Figure 2-5**. **Table 2-3** provides a breakdown of project components with associated square footages.

TABLE 2-3
ALTERNATIVE C – RETAIL DEVELOPMENT ON THE TWIN CITIES SITE

Area	Parking Spaces	Approximate Square Footage
Retail Development		185,000
Super Grocery Store		200,000
Membership Warehouse		125,000
Home Improvement		145,000
Restaurants		23,000
Gas Station / Car Wash		8,000
Total Development		**686,000**
Surface Parking	3,320 spaces	N/A
Source: Klai Juba Architects, 2014		

Retail Development

Under Alternative C, the proposed retail complex would be 686,000 sf, with at least 3,320 surface parking spaces. The retail facilities would employ approximately between 1,175 and 1,343 full-time equivalent employees and the restaurant facilities would employ approximately 160 full-time equivalent employees, for a total of approximately 2,160 employees (**Appendix H**). Alternative C would be identified by a large sign placed near the freeway that would be visible to travelers on Hwy 99. Under Alternative C, required site access improvements are similar to those described under Alternative A. Refer to the description of components under Alternative A **(Section 2.2.15** for more detail). The gas station/car wash would include buried underground storage tanks to store various grades of fuel, fuel pumps with canopies, a small mini-mart, and restrooms.



SOURCE: Klai Juba Architects, 2014; Microsoft aerial photograph, 2/2/2012; AES, 7/21/2015

Figure 2-5

Alternative C - Retail on the Twin Cities Site Plan

Public Services

SCSD and/or Galt PD would provide law enforcement to the retail development proposed under Alternative C. CalFire, the Cosumnes CSD Fire Department, or an equivalent entity would provide fire protection and emergency medical services.

Water Supply

The estimated average daily water consumption for Alternative C (including landscaping and irrigation) would be approximately 158,000 gpd. The water supply options for Alternative C are the same as those described under Alternative A. These options (Water Supply Option 1 and Option 2) are identical to those described above in **Section 2.2.5**. A fire flow of 3,000 gpm for four hours would be provided under Alternative C (**Appendix I**). Should an on-site WWTP be developed, recycled water would be used for indoor non-potable uses and for landscaping, dropping the peak day demand.

Wastewater Treatment and Disposal

The projected average daily wastewater flow for Alternative C would be approximately 104,000 gpd. Treated effluent from the on-site WWTP (Wastewater Option 1) would be discharged through sub-surface disposal, or through a combination of spray disposal and sub-surface disposal. For the disposal of peak day flows estimated at 138,000 gpd, 9.5 acres of leach fields would be required, as well as a 80,000 gallon effluent storage tank. Under the combined disposal option, approximately 6.2 acres of spray fields and 6.3 acres of leach fields would be developed. A 550,000 gallon effluent storage tank would be necessary to hold 20 days' worth of peak flow during rain events, when no surface disposal would occur. Effluent reuse would require a 110,000 gallon recycled water tank, as well as the other components described under Alternative A in **Section 2.2.5**.

As with Alternative A, Alternative C could tie into the City's WTTP via a proposed pipeline that would connect directly to the WWTP or develop on-site wastewater utilities be similar to Alternative A. This treatment and disposal system is described in detail under Alternative A and within the Water and Wastewater Feasibility Study (**Appendix I**).

Grading and Drainage

Construction would involve grading and excavation for building pads and parking lots. Alternative C would require minor on-site cut and fill, with some structural grade fill anticipated to be imported to meet engineering requirements for roadways, parking areas, and building footings. Approximately 59.2 acres of impervious surfaces would be created on-site. It is anticipated that approximately 270,000 cubic yards of fill is necessary to construct Alternative C. Approximately 16,000 cubic yards of fill soil may be available from excavation of the detention basins; therefore additional material would need to be imported excavated from other locations on or off the property. Under Alternative C, bio-filtration swales would be located around the Twin Cities site to take advantage of topography and building placement to provide

optimum site drainage as shown on **Figure 2-5**. A total of 11 acre-feet of on-site storage would be provided in the stormwater detention system to account for the increase in runoff created by new impervious surfaces.

Best Management Practices

Construction and operation of Alternative C would incorporate a variety of industry standard BMPs. **Section 5.0** presents select BMPs that have been specifically incorporated into the project design to avoid or minimize potential adverse effects resulting from the development of Alternative C.

2.5 ALTERNATIVE D – CASINO RESORT AT HISTORIC RANCHERIA SITE

2.5.1 PROJECT LOCATION AND ACCESS

Alternative D consists of development of a casino-hotel on the 75-acre Historic Wilton Rancheria site (Historic Rancheria site). The casino-hotel would be the same scope and size as Alternative A. The project components and square footages match the information provided in **Table 2-1**. **Figure 2-6** shows the conceptual site plan of the proposed development for Alternative D on the Historic Rancheria site, which is shown in relation to the Twin Cities site in **Figure 1-2**. The architectural design would be similar to Alternative A, as shown in **Figure 2-6** and described in **Section 2.2.5**. Alternative D would employ approximately 1,900 FTE employees (**Appendix H**).

Access to the Historic Rancheria site would be provided via two driveways along Green Road, located approximately 500 feet west of the existing Green Road/Randolph Road intersection and 200 feet east of the Green Road/Danlar Court intersection, which would be constructed as part of the project.

2.5.2 PROJECT COMPONENTS

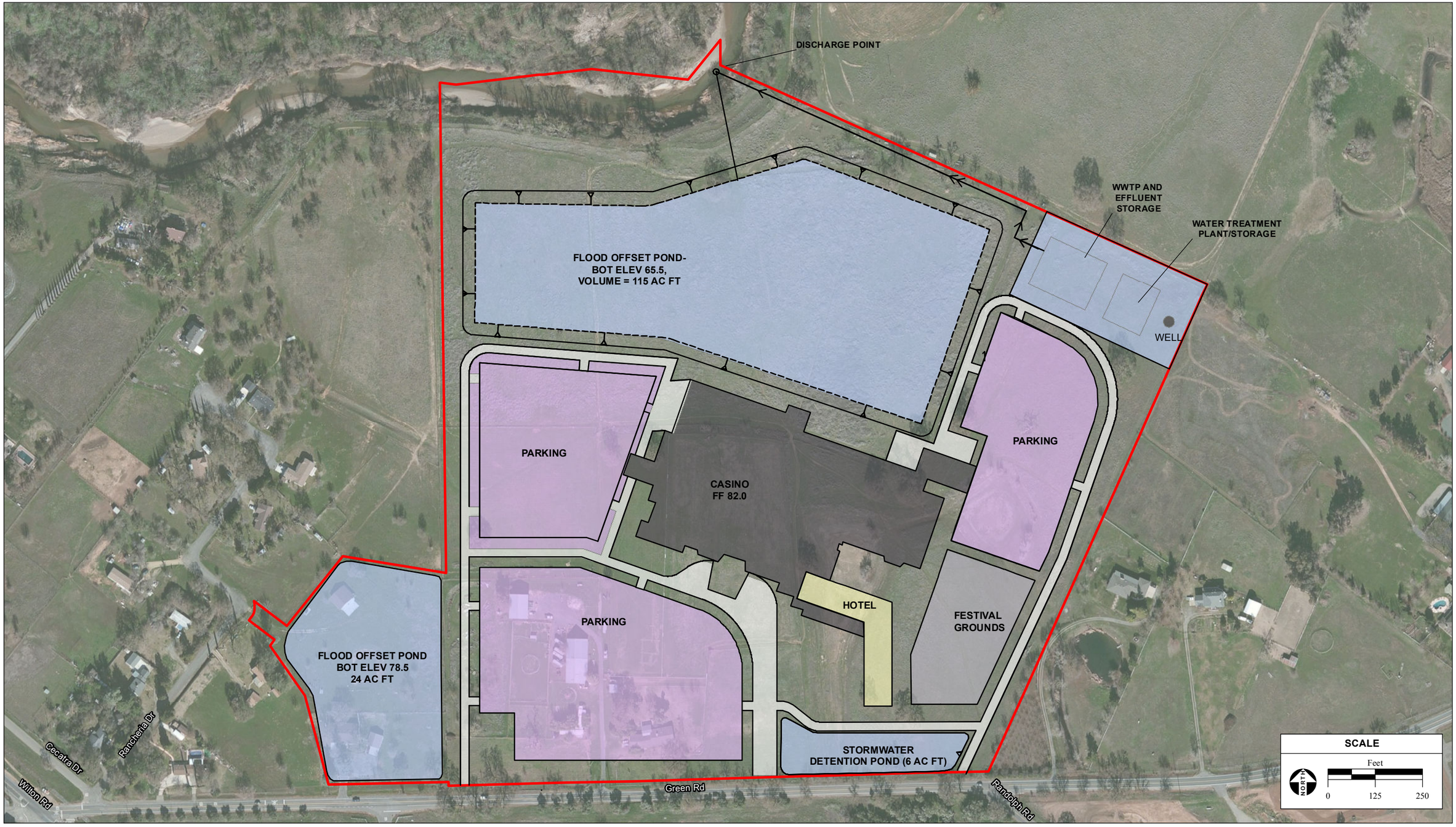
Public Services

SCSD in conjunction with Tribal security staff would provide law enforcement for the gaming facility and hotel complex. CalFire, the Cosumnes CSD Fire Department, or an equivalent entity would provide fire protection and emergency medical services to the gaming facility.

Water Supply

Domestic Water Supply

The estimated average daily water consumption for Alternative D (including landscaping and irrigation) would be approximately 362,000 gpd (**Appendix I**). Through the development of an on-site WWTP (as described below), recycled water would be used for indoor non-potable uses and for landscaping, dropping the peak day demand.



SOURCE: Klai Juba Architects, 2014; Microsoft aerial photograph, 2/2/2012; AES, 2014

Figure 2-6

Alternative D - Casino Resort at Historic Rancheria Site Plan

Components of the on-site water supply system would include two on-site wells (one for continuous supply and one for redundancy), a treatment plant, a 596,000 gallon water storage tank, and an internal distribution system. The approximate depth of the wells would be between 200 and 300 feet below the surface. The existing on-site wells, currently used in domestic and agricultural use, would either be abandoned, would be used as monitoring wells, or would remain in agricultural use.

The Tribe would implement the on-site water system recommendations contained in the Water and Wastewater Feasibility Study (**Appendix I**), which are identical to those discussed under Alternative A. In addition, wellhead treatment would be installed for any water quality constituent that exceeds EPA regulatory standards for drinking water. There is no off-site option for the Historic Rancheria site.

Wastewater Treatment and Disposal

Wastewater treatment and disposal would be provided by the development of an on-site WWTP and a treated effluent discharge point to the Cosumnes River. To accommodate the projected average daily flow (229,000 gpd) and peak flow from the casino development (305,000 gpd), the WWTP capacity would be 385,000 gpd. A recycled water tank with a capacity of approximately 220,000 gallons and an additional 200,000 gallon effluent disposal tank would be developed to store treated wastewater. The Tribe would implement the recommendations contained in the Water and Wastewater Feasibility Study (**Appendix I**), which are similar to those discussed under Alternative A Wastewater Option 1 with the exception of the discharge system to the Cosumnes River.

The proposed treatment and disposal facility would provide for the use of reclaimed water for casino toilet flushing and landscape irrigation. All water used for reclamation would meet the equivalent of State standards for recycled water as described in Title 22 of the California Code of Regulations. See **Section 2.2.5** for Title 22 information.

The remainder of treated wastewater would be discharged year-round from the WWTP to the Cosumnes River in compliance with the National Pollutant Discharge Elimination System (NPDES) waste discharge permit issued by the EPA. The proposed outfall location is identified in **Figure 2-6**.

Grading and Drainage

The grading and drainage plans for Alternative D can be found in **Appendix J**. The Historic Rancheria site would be graded to drain into several detention basins sized to maintain pre-project stormwater flows. An approximately 6-acre detention basin is proposed to ensure pre-project stormwater flows are maintained and to minimize the transport of pollutants in stormwater runoff. Discharge from this detention basin would be to an existing drainage channel along Green Road. A combination of two other detention basin/flood offset ponds (including one to the southwest that would require demolition of an existing residence) would provide 139 acre-feet of flood storage to offset development occurring in the 100-year floodplain (**Figure 2-6**). Approximately 40.6 acres of impervious surfaces would be created on-

site. It is anticipated that approximately 210,000 cubic yards of fill is necessary to construct Alternative D; this would be offset by approximately 233,000 cubic yards of excavated soil for the flood offset and stormwater ponds. Using a shrinkage factor of 10 percent, the site is "balanced," with no net import or export of soil. Finished floor elevation would be approximately 82.0 feet for the potential buildings at the site, 1.6 feet above the Base Flood Elevation (BFE). This would require fill material to raise the site approximately ten feet above the existing grade. Parking areas and drive isles would be permitted to pond no deeper than one foot during a 100-year flood.

Under Alternative D, bio-filtration swales would be located around the Historic Rancheria site to take advantage of topography and building placement to provide optimum site drainage. Pipe sizes would be optimized to keep the 100-year event hydraulic grade line below the pad elevation. The detention basin/flood offset pond would include an outfall to the Cosumnes River. The discharge to the Cosumnes River would require an NPDES permit from the EPA. The stormwater detention basin would be operated, where possible, to maximize treatment of stormwater pollutants (**Appendix J**).

Energy

Electrical service to the Historic Rancheria site is currently provided by SMUD. No existing natural gas service lines connect to the site, nor is extending service to the site proposed.

Best Management Practices

As with Alternative A, construction and operation of Alternative D would incorporate a variety of industry standard BMPs. **Section 5.0** presents select BMPs that have been specifically incorporated into the project design to avoid or minimize potential adverse effects resulting from the development of Alternative D.

2.6 ALTERNATIVE E – REDUCED INTENSITY CASINO AT HISTORIC RANCHERIA SITE

Alternative E consists of development of a scaled-down gaming facility on the Historic Rancheria site identical in size to Alternative B (Table 2-3). Figure 2-7 shows the conceptual site plan of the proposed development for Alternative E. Alternative E is anticipated to employ approximately 1,500 FTE employees (Appendix H). The approximate average number of patrons per weekday is 8,100-9,000, while the number of anticipated daily weekend patrons is 12,900-14,200 (Boyd, 2014).

2.6.1 PROJECT COMPONENTS

Under Alterative E, the required site access improvements are similar to those described under Alternative D. Refer to the description of project location and access under Alternative D (**Section 2.5.1**).

SOURCE: Klai Juba Architects, 2014; Microsoft aerial photograph, 2/2/2012; AES, 2014

Figure 2-7

Alternative E - Reduced Intensity Casino at Historic Rancheria Site Plan

Public Services

SCSD in conjunction with Tribal security staff would provide law enforcement for the gaming facility. CalFire, the Cosumnes CSD Fire Department, or an equivalent entity would provide fire protection and emergency medical services to the gaming facility.

Water Supply

The estimated average daily water consumption for Alternative E (including landscaping and irrigation) would be approximately 265,000 gpd (**Appendix I**). Through the development of an on-site WWTP, recycled water would be used for indoor non-potable uses and for landscaping, dropping the peak day demand.

Similar to Alternative D, the components of the on-site water supply system proposed under Alternative E would include two on-site wells (one for continuous supply and one for redundancy), a treatment plant, a 458,000 gallon water storage tank, and an internal distribution system. The Tribe would implement the on-site water system recommendations contained in the Water and Wastewater Feasibility Study (**Appendix I**), which are identical to those discussed under Alternative A. Wellhead treatment would be installed for any water quality constituent that exceeds EPA regulatory standards for drinking water.

Wastewater Treatment and Disposal

The projected average daily wastewater flow for Alternative E would be approximately 151,000 gpd, with peak day flows estimated at 201,000 gpd. Similar to Alternative D, Alternative E includes a 250,000 gpd on-site WWTP, a 175,000 gallon recycled water storage tank, a 150,000 gallon effluent disposal tank, and a direct discharge point to the Cosumnes River pursuant to an NPDES discharge permit.

The Tribe would implement the recommendations for development of a WWTP contained in the Water and Wastewater Feasibility Study (**Appendix I**), which are similar to those discussed under Alternative A Wastewater Option 1. Similar to Alternative D, treated wastewater would be discharged year-round from the WWTP to the Cosumnes River in compliance with the NPDES permit required by the EPA.

Grading and Drainage

The grading and drainage plans for Alternative E can be found in **Appendix J**. The Historic Rancheria site would be graded to drain into two detention basins sized to maintain pre-project stormwater flows. An approximately 6-acre detention basin is proposed to ensure pre-project stormwater flows are maintained and to minimize the transport of pollutants in stormwater runoff. Discharge from this detention basin would be to an existing drainage channel along Green Road. A combination of two other detention basin/flood offset ponds (including one to the southwest that would require demolition of an existing residence) would provide 114 acre-feet of flood storage to offset development occurring in the 100-year floodplain (**Figure 2-7**). Approximately 40.6 acres of impervious surfaces would be created on-

site. It is anticipated that approximately 177,000 cubic yards of fill is necessary to construct Alternative E. This would be offset by approximately 197,000 cubic yards of excavated soil for the flood offset and stormwater ponds. Using a shrinkage factor of 10 percent, the site is "balanced," with no net import or export of soil. Finished floor elevation would be approximately 82.0 feet for the potential buildings at the site, 1.6 feet above the BFE. This would require fill material to raise the site approximately ten feet above the existing grade. Parking areas and drive isles would be permitted to pond no deeper than one foot during a 100-year flood.

Bio-filtration swales would be located around the Historic Rancheria Site to take advantage of topography and building placement to provide optimum site drainage. Pipe sizes would be optimized to keep the 100-year event hydraulic grade line below the pad elevation. The detention basin/flood offset pond would include an outfall to the Cosumnes River. The discharge to the Cosumnes River would require an NPDES permit from the EPA. The stormwater detention basin would be operated, where possible, to maximize treatment of stormwater pollutants (**Appendix J**).

Best Management Practices

Construction and operation of Alternative E would incorporate a variety of industry standard BMPs. As **Section 5.0** presents select BMPs that have been specifically incorporated into the project design to avoid or minimize potential adverse effects resulting from the development of Alternative E.

2.7 ALTERNATIVE F – CASINO RESORT AT MALL SITE

Alternative F consists of development of a gaming facility on the 28-acre Elk Grove Mall site (Mall site). The casino/hotel development would be constructed on a property previously developed as a regional shopping center (Lent Ranch Mall/Elk Grove Promenade). A portion of the Mall site contains partially developed structures, surface parking lots, utility infrastructure, and existing site access points. Some buildings present on the site would be demolished while others would be reconfigured. **Table 2-4** provides a breakdown of Alternative F components with associated square footages. Alternative F would be constructed to meet the International Building Code. **Figure 2-8** shows the conceptual site plan of the proposed development for Alternative F.

Alternative F would employ approximately 1,750 full FTE employees (**Appendix H**) and would serve 8,100 – 9,000 patrons per day on weekdays, and 12,900 – 14,200 on weekends (Boyd, 2014).

2.7.1 PROJECT LOCATION

The proposed casino/hotel facility on the Mall site would be 611,055 sf. The gaming floor would be 110,260 sf. Restaurant facilities include a 360-seat buffet, as well as a café, sports bar, food court, and other food and beverage providers. A 60-seat pool grill, a retail area of approximately 2,600 sf, an approximately 3,000 sf fitness center, an approximately 8,500 sf spa, and an approximately 48,000 sf

SOURCE: Klai Juba Architects, 2014; Microsoft aerial photograph, 2/2/2012; AES, 2015

Figure 2-8
Alternative F - Casino Resort at Mall Site Plan

TABLE 2-4
ALTERNATIVE F – CASINO RESORT AT MALL SITE

Area	Seats/Rooms/ Parking Spaces	Approximate Square Footage
Casino		
Main Floor		96,360
High Limits		7,100
Poker		6,800
Front of House Services		
Retail		2,600
Fitness		3,000
Spa		8,500
Other services		15,850
Restaurants		
Buffet	360 seats	9,450
Café	150 seats	4,600
Specialty Tenants/Other	265 seats	14,450
Bar/Lounge	235 seats	8,300
Pool Grill	60 seats	2,200
Steakhouse	150 seats	4,075
Employee Dining	125 seats	3,300
Convention Center		48,150
Casino Support		1,200
Hotel		
Standard/ Suites	307 rooms	229,680
On-Site Parking[3]		
Valet	500 spaces	
Surface Parking	790 spaces	
Employee	500 spaces	
Back of House		145,440
Total Square Footage		611,055

[1]Total back of house square feet less 36,080 sf hotel back of house included above.
[2]Line items do not precisely add to total due to rounding.
[3]Additional parking will be provided by the adjacent mall.
Source: Klai Juba Architects, 2014

convention center are also proposed. The proposed hotel would be 12 levels and a total of 307 guest rooms, totaling approximately 229,680 sf. The casino and hotel would be identified by a large sign placed near the freeway that would be visible to travelers on Hwy 99.

Access to the Mall site would be provided via existing driveways located along Promenade Parkway. Currently two direct access points are located along Promenade Parkway, including a major intersection at Bilby Road and a secondary non-signalized entrance to the north.

2.7.2 PROJECT COMPONENTS

Public Services

The City of Elk Grove Police Department (EGPD) in conjunction with Tribal security staff would provide law enforcement for the gaming facility and hotel complex. The Cosumnes CSD Fire Department would provide fire protection and emergency medical services to the gaming facility.

Water Supply

Water supply demands for Alternative F would be supplied through connections to Sacramento County Water Agency (SCWA) infrastructure partially developed on the Mall Site. Two connection points to the SCWA pipelines are proposed (**Appendix I**). The estimated average daily water consumption for Alternative F (including landscaping and irrigation) would be approximately 260,000 gpd (**Appendix I**). A flow rate of 4,000 gpm would be provided by SCWA for fire flow (**Appendix I**).

SCWA has capacity to meet anticipated demand for domestic water use under Alternative F (**Appendix I**); however, the Tribe would resubmit water improvement plans to SCWA and pay the remaining water development fees.

Wastewater Treatment and Disposal

Under Alternative F, the Tribe would obtain a services agreement with the Sacramento Regional County Sanitation District (SRCSD) and the Sacramento Area Sewer District (SASD) to provide sewer service to the Mall site. The projected average daily wastewater flow for Alternative F would be approximately 232,000 gpd, with peak day flows estimated at 309,000 gpd.

Partially completed connections to SASD infrastructure are located on and in the immediate vicinity of the Mall Site. Under Alternative F, the completion of these connections to the existing wastewater conveyance system would occur and wastewater would be conveyed to the SRCSD WWTP where treatment would occur. Treated effluent would meet water quality guidelines as discussed further in **Section 4.3**, Water Resources.

Grading and Drainage

Construction would involve minor improvements to the Mall site to allow for improvement to drain via gravity. Approximately 12 acres of impervious surface would be created on-site. As discussed in the Grading and Drainage Analysis Report (Summit, 2014b; **Appendix J**), Alternative F would require approximately 7,000 cubic yards of structural grade fill be imported to meet engineering requirements.

A preliminary drainage plan has been prepared for Alternative F to manage surface water flow and prevent downstream impacts. The development of Alternative F would include connections to the

existing storm drainage system previously developed on the Mall site. The existing system is routed to an off-site stormwater detention basin, located approximately 0.5 miles west of the Mall site. The detention basin and storm drain system has been sized assuming full development of the Mall site and adjacent properties (City of Elk Grove, 2005). The basin has been sized to detain runoff from the 100-year, 48 hour storm and to treat water pursuant to the existing MS4 permit for the City of Elk Grove.

Energy

SMUD provides electricity to the site and PG&E provides natural gas to the Mall site. On-site utility infrastructure is already present at the Mall site, although connections were not finalized during previous development.

Best Management Practices

Construction and operation of Alternative F would incorporate a variety of industry standard BMPs. **Section 5.0** presents select BMPs that have been specifically incorporated into the project design to avoid or minimize potential adverse effects resulting from the development of Alternative F.

2.8 ALTERNATIVE G– NO ACTION

Under the No Action Alternative, none of the development alternatives considered within this EIS would be implemented. The No Action Alternative assumes that existing uses on the Twin Cities Site would not change in the near term, but may change in the longer term if the site is annexed into the City of Galt for development. In the short-term, it is assumed that no development would occur on any of the alternative sites. However, the Twin Cities site is located in an area close to recent commercial development and the site also has good ingress/egress to Highway 99 as well as reasonable highway visibility. In addition, although it is not currently within Galt city limits, the site is situated within the City of Galt's sphere of influence. Consequently, it is reasonable to assume that in the longer term some level of development will probably occur on this site, or on a portion of the site. If and when this occurs, the site would likely be developed with a highway commercial land use. However, future possible development outcomes of the Twin Cities site are not reasonably foreseeable under Alternative G, the No Action Alternative, because of the following uncertainties:

- Size and scope of possible development projects.
- Timing of possible development projects.
- Timing and sufficiency of new infrastructure (e.g., roads, fresh water, waste water, etc.) in the absence of infrastructure that would occur as a result of the development of Alternative A, B or C.
- Timing of the site's possible future incorporation of the site into the Galt city limits in the absence of the development of Alternative A, B or C, and the implications of such incorporation.

Under the No Action Alternative, there would be no change to existing uses on the Historic Rancheria site. The site would remain in its rural-residential state for the foreseeable future.

Under the No Action Alternative, the Mall site's partial development would likely be completed, although the precise timing and extent of such development is not currently reasonably foreseeable. In the absence of the occurrence of Alternative F, future development of the Mall site that may occur would likely be centered in typical commercial and retail uses.

Under the No Action Alternative, the BIA would not take any actions in furtherance of its obligation to promote tribal self-determination and economic development.

2.9 ALTERNATIVES ELIMINATED FROM CONSIDERATION

The intent of the analysis of alternatives in the EIS is to present to decision-makers and the public a reasonable range of alternatives that are both feasible and sufficiently different from each other in critical aspects. Section 1502.14(a) of the CEQ's Regulations for implementing National Environmental Policy Act (NEPA) requires a brief discussion of alternatives that were eliminated from further study and the reasons for their having been eliminated. Several factors were considered in determining which alternatives should not be subjected to detailed analysis and review. First, alternatives that are not reasonably feasible were not subject to further analysis. Second, alternatives that do not accomplish the purpose of an action were not studied in detail. Third, alternatives that do not significantly differ from other alternatives subjected to detailed analysis were not studied in detail. The alternatives discussed below were considered for development but rejected from detailed analysis (1) because these alternatives were determined to be infeasible and would not fulfill the stated purpose and need, (2) because these alternatives were not sufficiently different from other alternatives analyzed herein, or (3) for the reasons set forth below.

2.9.1 SEVEN MILE SITE

The Seven Mile site comprises approximately 160-acres within the unincorporated County, west of Highway 99 and north of Twin Cities Road. The Seven Mile site is located to the north of the Twin Cities site across Laguna Creek. Sensitive biological habitats have been identified on and in the vicinity of the Seven Mile site, including freshwater emergent wetlands and vernal pool habitat. The Seven Mile site was eliminated from consideration based on the presence of special status species habitat and documented occurrences of several special status species, including the giant garter snake (*Thamnophis gigas*), western pond turtle (*Emys marmorata*), California fairy shrimp (*Linderiella occidentalis*), vernal pool tadpole shrimp (*Lepidurus packardi*), vernal pool fairy shrimp (*Branchinecta lynchi*), and Swainson's hawk (*Buteo swainsoni*), which would have significantly increased biological constraints.

2.9.2 DIOCESE SITE

The Diocese site comprises approximately 180-acres within the unincorporated County, immediately south of the City WWTP and north of rural residential areas and the California Department of Corrections Training Center, which includes a gun range and a training facility. The primary environmental constraints for development at the Diocese site include the presence of the Union Pacific Railroad separating the site from Highway 99 interchanges, the potential for soil/groundwater contamination resulting from the discharge of effluent from the adjacent City WWTP, and the close proximity to the firing range located within the California Department of Corrections facility. These land use incompatibilities were the primary reasons the site was removed from further consideration.

2.9.3 MINGO SITE

The Mingo site comprises approximately 185-acres within the unincorporated County, to the immediate east of Highway 99 and south of Mingo Road. The Mingo site was eliminated from consideration based on both its location within the FEMA 100-year floodplain and the documented freshwater emergent wetlands located on the eastern portion of the Mingo site adjacent to Skunk Creek, which would have introduced significant biological constraints.

2.9.4 DRY CREEK SITE

The Dry Creek site comprises approximately 90-acres within the incorporated City of Galt, to the east of Highway 99 and Crystal Way and south of Boessow Road. One freshwater emergent wetland is on the northwest portion of the Dry Creek site. The Dry Creek site was eliminated from consideration based on its location within both the FEMA 100-year and 500-year floodplains and the presence of special status species habitat and documented occurrences of midvalley fairy shrimp (*Branchinecta mesovallensis)*, California tiger salamander (*Ambystoma californiense)*, and valley elderberry longhorn beetle (*Desmocerus dimorphus*), which would have increased biological constraints significantly.

2.9.5 NON-GAMING ON THE HISTORIC RANCHERIA SITE

A non-gaming alternative on the Historic Rancheria site was eliminated from further consideration in the EIS because it would not generate enough revenue to fulfill the stated purpose and need due to this location's distance from both I-5 and Hwy 99.

2.9.6 REDUCED INTENSITY AND RETAIL ON THE MALL SITE

A reduced-intensity development was eliminated from consideration on the Mall site because the environmental effects on the Mall site are already likely to be relatively low since the site is already partially developed. Due to retail market saturation, a non-gaming alternative on the Mall site was eliminated, as competitive effects would result in increased socioeconomic effects on other retailers.

Additionally, because of the market saturation, it is unlikely that this alternative would generate the necessary revenue to fulfill the purpose and need of the Proposed Action.

2.10 COMPARISON OF ALTERNATIVES

Section 1502.14 of the CEQ's Regulations for Implementing NEPA states that an EIS should present environmental impacts of proposed alternatives in a comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public. Alternatives considered must include those that may be feasibly accomplished in a successful manner considering economic, environmental, social, technological, and legal factors. A summary comparison of each of the proposed alternatives, including the No Action Alternative, is provided below.

2.10.1 SUMMARY OF ALTERNATIVES

Alternatives A and B have the following similar components: (1) fee-to-trust transfer of the Twin Cities site and (2) development of a casino facility, site retail, parking, and supporting facilities. Alternative A also includes a hotel and related amenities including a convention center, fitness center, spa, and pool grill.

Under Alternative B, there would be no hotel or related amenities, making the casino complex smaller than Alternative A's. It would therefore have reduced construction and developments costs as well as lesser environmental impacts compared to Alternative A. The revenue from Alternative B would be less than that from Alternative A.

Alternative C is a non-gaming alternative that would develop a retail complex, parking, and supporting facilities on the Twin Cities site. The revenue generated by this alternative would be significantly less than the revenues generated for Alternatives A and B and would limit the number of programs and services the Tribe could offer to its members. Most of the environmental impacts under Alternative C would be similar to those of Alternative A because the site footprint of Alternative C is comparably to Alternative A. However, the socioeconomic impacts would be significantly different from Alternative A because Alternative C does not include a gaming venue and because the revenue derived from the Tribe would be significantly less under Alternative C.

Alternative D and E have the following similar components: (1) fee-to-trust transfer of the Historic Rancheria site and (2) development of a casino facility, site retail, parking, and supporting facilities. Alternative D also includes a hotel and the related amenities detailed in Alternative A, including a convention center, fitness center, spa, and pool grill. However, the location of these alternatives on the more remote Historic Rancheria site make these alternatives less able to generate the necessary revenue to fulfill the stated purpose and need.

Alternative E, like Alternative B, lacks the additional amenities, which leads to correspondingly lesser environmental impacts, construction and development costs, and ability to generate revenue for the Tribe.

Alternative F includes a fee-to-trust transfer of the Mall Site and development of a casino facility, site retail, parking, and supporting facilities. Like Alternatives A and D, Alternative F would include a hotel, convention center, fitness center, spa, and restaurants. The environmental impacts of Alternative F are similar to those of Alternative A because Alternative F is a gaming venue of comparable size and scope to Alternative A. The differences in environmental impacts that would occur under Alternative F as compared to Alternative A are mostly attributable to variations between the layouts and locations of the two sites.

Alternative G is the No Action alternative, which would involve no fee-to-trust transfer and result in no economic benefits to the Tribe.

2.10.2 Comparison of Environmental and Economic Consequences

In accordance with CEQ Regulations, the alternatives considered in this document include those which could accomplish most of the purpose and need for the project, and that could avoid or substantially lessen one or more of the significant effects of the project. **Section 4.0** describes potential environmental impacts as a result of each alternative, while **Section 5.0** identifies appropriate mitigation to reduce potential adverse effects of development. A summary comparison of environmental impacts is provided below:

- Alternative A would result in increased employment and economic growth and would also result in an increase in demand for goods and services. Project-related traffic associated with Alternative A would generate a significant increase in traffic which would increase air emissions and noise effects, both during construction and operation. Of the alternatives evaluated in this EIS, Alternative A would best meet the purposes and needs of the BIA in promoting the long-term economic vitality and self-governance of the Tribe as the casino-resort facility described under Alternative A would provide the Tribe with the best opportunity for securing a viable means of attracting and maintaining a long-term, sustainable revenue stream.

- Alternative B would result in increased employment and economic growth and would also result in an increase in demand for goods and services, but to a lesser extent than under Alternative A. Alternative B would generate less traffic than Alternative A and therefore would have fewer impacts associated with traffic congestion, mobile air emissions and traffic-related noise effects. During construction, traffic impacts would also be less than under Alternative A, as the footprint would be smaller, requiring fewer trips to deliver materials, less equipment, and fewer trips to transport fill. Alternative B would also provide economic development opportunities for the Tribe; however, the economic returns would be smaller than under Alternative A and, therefore,

would not be the most efficient means of attracting and maintaining a long-term, sustainable revenue stream.

- Alternative C would result in less employment and economic growth for both the Tribe and neighboring communities than would occur from Alternatives A and B. Alternative C would have reduced impacts compared to Alternative A relating to traffic, air quality, noise, and public utilities during both construction and operation. The competitive market forces associated with commercial development, the amount of competitive commercial development within the County, and the substantially lower profitability of retail development in comparison to gaming operations make Alternative C less attractive than Alternative A from the standpoint of securing a long-term, sustainable revenue stream. Due to the amount of competitive commercial development that already exists in the area, there would be less demand for the goods and services than Alternative C would provide.

- Alternative D would result in increased employment and economic growth, resulting in an increase in demand for goods and services. Project-related traffic would increase emissions and noise effects during construction and operation under Alternative D. Alternative D also has the highest potential for adverse biological effects and would require the most significant grading and drainage changes. Alternative D would provide the Tribe with a good opportunity for maintaining a long-term, sustainable revenue stream. In comparison to Alternative A, Alternative D is less attractive because of its lower revenue stream, its potential for adverse biological effects (the highest of the alternatives analyzed), and its more significant grading and drainage costs.

- Alternative E would result in increased demand for goods and services. Increased traffic would have a negative effect on air quality and noise levels; however, all of these effects would be less severe than under Alternative D. Construction impacts would also be reduced compared to those of Alternative D. Alternative E would also provide economic development opportunities for the Tribe; however, the economic returns would be smaller than under Alternative A and D, and therefore Alternative E would not be the most efficient means of attracting and maintaining a long-term, sustainable revenue stream.

- Alternative F would result in an increased demand for goods and services. Because most of the required infrastructure is already in place at the Mall site, and the site itself is already partially developed, environmental impacts would be less than the other development alternatives. Additionally, an agreement is not currently in place for the purchase of the Mall site by the Tribe.

- Alternative G, the No Action alternative, would avoid all environmental effects associated with the development of Alternatives A, B, C, D, and E, and thus would have significantly less environmental effects. However, this alternative would not meet the purpose and need for the Proposed Action.

Based on the considerations discussed above, Alternative A is the alternative that best meets the purpose and need of the Tribe to establish and maintain a long-term, sustainable revenue stream, while addressing environmental concerns in both the project design and with mitigation measures. Revenue and employment opportunities generated by Alternative A would allow the Tribe to be fully self-reliant, to provide employment opportunities for tribal members, and to strengthen the tribal government. For a detailed, quantitative discussion of potential environmental consequences associated with each of the alternatives, refer to **Section 4.0**. Measures to avoid, minimize, or mitigate adverse effects are provided in **Section 5.0**.